



VIA CM/ECF

Richard C. Weinblatt  
weinblatt@swdelaw.com

July 7, 2014

The Honorable Gregory M. Sleet  
U.S. District Court for the District of Delaware  
844 N. King Street  
Wilmington, DE 19801

**RE: *Inventor Holdings, LLC v. Wal-Mart Stores, Inc.*,  
C.A. No. 1:13-cv-96-GMS**

*Inventor Holdings, LLC v. PayNearMe, Inc. et al.*,  
C.A. No. 1:13-cv-98-GMS

*Inventor Holdings, LLC v. Kmart Corporation*,  
C.A. No. 1:14-cv-185-GMS

*Inventor Holdings, LLC v. Bed Bath & Beyond Inc.*,  
**C.A. No. 1:14-cv-448-GMS**

---

Dear Judge Sleet:

In anticipation of the teleconference scheduled for July 9, 2014 at 2:00 pm in the above-captioned matters regarding the areas in which the parties disagree for the proposed protective order, the parties jointly submit the following items to be presented to the Court

- Whether the technical expert is permitted to use a laptop to take notes during the source code inspection (Paragraph 9(d)).
- The number of pages of source code the receiving party is permitted to print (Paragraph 9(m)).
- The description of technology for the prosecution bar (Paragraph 10).
- Whether the prosecution bar should apply to post-grant proceedings (Paragraph 10).

A copy of the proposed Protective Order, which indicates the parties' respective proposals on these disputed points, is attached hereto as Exhibit A. The parties appreciate the Court's time with regard to addressing this matter.

Very truly yours,

Richard C. Weinblatt (#5080)  
of Stamoulis & Weinblatt LLC

TWO FOX POINT CENTRE

6 Denny Road | Suite 307 | Wilmington, DE 19809 | T 302 999 - 1540

[www.swdelaw.com](http://www.swdelaw.com)

The Honorable Gregory M. Sleet

July 7, 2014

Page 2

Attachment: Exhibit A

cc: All Registered Counsel (via CM/ECF)